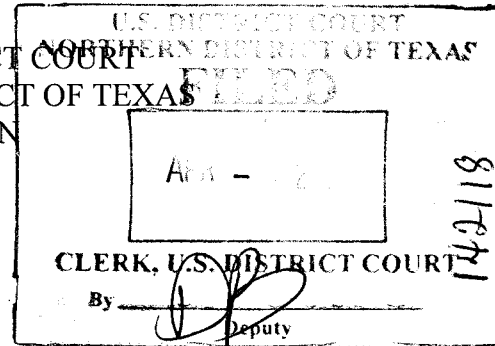


ORIGINAL
UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION



20/20 MANAGEMENT COMPANY, INC.,
ST. JOHN'S HOLDINGS, INC., AND
MICHAEL NEARY,

PLAINTIFFS,

vs.

COMUNIDAD CORPORATION, ALLAN
KLEIN, MITCHELL KOBERNICK,
INDIVIDUALLY AND MIKOB
PROPERTIES, INC., *et al.*,

DEFENDANTS.

CIVIL ACTION NO. **3:08-CV-60820**
(Jury Requested)

20850

NOTICE OF REMOVAL

Pursuant to 28 U.S.C §§ 1452 and 1334, Defendant Comunidad Kensington Club I, LLC ("Comunidad Kensington"), files this Notice of Removal to the United States District Court for the Northern District of Texas, Dallas Division, and in support thereof respectfully states:

Procedural Background

1. On December 29, 2005, this civil action was commenced in the 134th District Court of Dallas County, Texas, under Cause No. 05-12895, *20/20 Management Company, Inc., St. John's Holdings, Inc., and Michael Neary vs. Comunidad Corporation, Allan Klein, Mitchell Kobernick, and Mikob Properties, Inc., et al.* (the "State Court Action"). All documents filed in the State Court Action, excluding discovery material, together with a complete index of those documents are attached hereto.

2. The State Court Action is a suit for alleged real estate brokerage fees. Plaintiffs have claimed an interest in the real property owned by Comunidad Kensington and have filed a lis pendens on that property. Even though the lis pendens has no basis in law, Plaintiffs have refused to remove the lis pendens.

3. Comunidad Kensington was joined as a defendant and served with citation on December 5, 2007. On December 21, 2007, Comunidad Kensington filed its original answer.

4. A jury trial has been requested.

5. On March 31, 2008, Comunidad Kensington filed a voluntary petition under Chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Southern District of Texas, Houston Division, under Case No. 08-32127 (the "Bankruptcy Case").

The Court Has Jurisdiction Pursuant to 28 U.S.C. § 1334.

6. This Court has original but not exclusive jurisdiction of all civil actions "arising under Title 11, or arising in or related to cases under Title 11." 28 U.S.C. § 1334(b). The pending State Court Action is related to the Bankruptcy Case now pending in the United States Bankruptcy Court for the Southern District of Texas, because Comunidad Kensington, a defendant, has filed a voluntary petition under Chapter 11 of the United States Bankruptcy Code. Comunidad Kensington's primary asset in the Bankruptcy Case is the real property in which Plaintiffs have claimed an interest. Accordingly, the State Court Action is related to the Bankruptcy Case and may be removed to this Court pursuant to 28 U.S.C. § 1452.

7. Comunidad Kensington may therefore remove the case to this Court pursuant to 28 U.S.C. §§ 1334(b) and 1452.

All Requirements for Removal Have Been Met and Removal to This Court Is Proper.

8. This Notice of Removal is timely. Pursuant to Rule 9027(a)(2) of the Fed. Rules of Bankr. Proc., the State Court Action was removed within 90 after the order for relief in the Bankruptcy Case. The Bankruptcy Case was filed on March 31, 2008, less than one week prior to the filing of the Notice of Removal.

9. The State Court Action, upon its removal, is a core proceeding within the meaning of 28 U.S.C. § 157.

10. The United States District Court of the Northern District of Texas, Dallas Division, is the proper court in which to remove this action pursuant to 28 U.S.C. § 1452(a) and Rule 9027(a)(1) of the Fed. Rules of Bankr. Proc., in that the State Court Action is pending in this district and division.

11. Comunidad Kensington is serving written notice upon all parties who have made an appearance in the State Court Action, and is filing a copy of this Notice of Removal with the Clerk of the District Court in the 134th Judicial District Court, Dallas County, Texas.

12. Comunidad Kensington has attached to this Notice of Removal all documents filed in the State Court Action, excluding discovery material but including process, pleadings, orders, and all other filings in the state court action, as required by 28 U.S.C. § 1446(a). Pursuant to Local Rule 81.1, attached to this Notice of Removal are the following:

- (a) an index of all documents that clearly identifies each document and indicates the date the document was filed in state court (Exhibit A);
- (b) a copy of the docket sheet in the State Court Action (Exhibit B);
- (c) each document filed in the State Court Action, except discovery material (Exhibit C); and

(d) a separately signed certificate of interested persons (Exhibit D).

WHEREFORE, Defendant Comunidad Kensington Club I, LLC requests that the above-entitled action be removed from the 134th Judicial District Court, Dallas County, Texas, and that this Court take jurisdiction of the case to final judgment in accordance with the laws of the United States.

Respectfully submitted,

LAW OFFICE OF MARK A. SANDERS

By: 

Mark A. Sanders
State Bar No. 17600500
11451 Katy Freeway, Ste. 501
Houston, Texas 77079
Telephone: 713-468-7700
Telecopier: 713-468-7701
Counsel for Defendant
Comunidad Kensington Club I, LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Notice of Removal was delivered to all counsel of record on the 9th day of April, 2008, via facsimile, as follows:

and on hand delivery

Mitchell Madden
MADDEN SEWELL, L.L.P.
Four Hickory Centre
1755 Whittington Place, Suite 300
Dallas, Texas 75234
Counsel for Plaintiffs
20/20 Management Company
St. John's Holdings, Inc.
Michael Neary

Michael W. Eaton
EATON LAW FIRM, PLLC
1310 N. White Chapel Road, Suite 200
Southlake, Texas 76092
Telecopier: 817-410-9525
Telephone: 817-410-9500
Counsel for Defendant
Comunidad Corporation

Lawrence J. Friedman
Bart F. Higgins
R. Brian Shields
FRIEDMAN & FEIGER, L.L.P.
5301 Spring Valley Road, Suite 200
Dallas, Texas 75254
Counsel for Intervenor
International Realty Concepts, Inc.



Mark A. Sanders

EXHIBIT A

INDEX OF DOCUMENTS FILED WITH THE COURT

TAB #	DATE	EVENTS & ORDERS OF THE COURT
1.	12/29/05	Original Petition and Jury Demand
2.	12/29/05	Citation and Return of Service on Mikob Properties, Inc., Mikob, Ltd., Mitchell Kobernick, Allan Klein and Mitchell Kobernick, as General Partner (served 05/09/06)
3.	02/28/06	Original Answer of Defendant Comunidad Corporation
4.	03/28/06	Plaintiffs' Motion for Substituted Service
5.	04/07/06	Order Granting Motion for Substituted Service
6.	06/06/06	Original Answer of Defendants Allan Klein, Mitchell Kobernick and Mikob Properties, Inc.
7.	06/13/06	Notice of Jury Trial Setting – 10/09/06
8.	06/13/06	Mediation Order
9.	06/23/06	Plaintiffs' Designation of Attorney-in-Charge
10.	09/20/06	Rule 11 Agreement with proposed Scheduling Order
11.	09/26/06	Docket Control Order
12.	09/27/06	Notice of Resetting of Jury Trial - 02/26/07
13.	10/27/06	Plaintiffs' Designation of Expert Witness
14.	12/01/06	Defendants Allan Klein, Mitchell Kobernick, and Mikob Properties, Inc.'s Designation of Expert Witness
15.	12/12/06	Defendant Comunidad Corporation's Motion for Protective Order
16.	01/10/07	Plaintiffs' Rule 11 Agreement
17.	02/20/07	Agreed Motion for Continuance
18.	03/14/07	Notice of Resetting of Jury Trial - 08/20/07
19.	03/20/07	Plaintiffs' First Amended Petition
20.	03/30/07	Plaintiffs' Motion to Compel Discovery from Defendant Comunidad Corporation and Request for Sanctions
21.	04/12/07	Letter rescheduling the scheduling conference for 04/23/04
22.	04/24/07	Notice of Resetting of Jury Trial - 10/29/07
23.	04/30/07	Defendants' Motion to Cancel Notices of Lis Pendens
24.	05/15/07	Notice of Hearing – 06/11/07
25.	06/11/07	Plaintiffs' Response to Defendants' Motion to Cancel Notices of Lis Pendens
26.	06/11/07	Plaintiffs' Second Amended Petition
27.	07/06/07	Notice of vacation letter from Mark Sanders
28.	07/19/07	Agreed Confidentiality and Protective Order
29.	08/21/07	Notice of Hearing – 09/04/07
30.	08/21/07	Defendants' Emergency Motion to Determine Adequate Protection Under Tex. Prop. Code §12.008(a) and to Cancel Notices of Lis Pendens
31.	08/21/07	Defendants' Mikob Properties, Inc., Mitchell Kobernick and Allan Klein's, No Evidence and Motion for Traditional Summary Judgment

TAB #	DATE	EVENTS & ORDERS OF THE COURT
32.	08/21/07	Affidavit of John Martin
33.	08/21/07	Affidavit of Mitchell Kobernick
34.	09/24/07	Notice of Scheduled Mediation Conference
35.	09/25/07	Letter Brief from Mark Sanders re: Motion to Cancel Lis Pendens
36.	10/09/07	Agreed Motion for Continuance and Entry of New Scheduling Order
37.	10/09/07	Notice of non-settlement from mediator
38.	10/16/07	Order Granting Agreed Motion for Continuance of Trial Date
39.	10/17/07	Notice of Resetting of Jury Trial - 05/19/08
40.	10/19/07	Defendants' Motion for Reconsideration of Motion to Cancel Notices of Lis Pendens
41.	10/23/07	Amended Certificate of Conference for Defendants' Motion for Reconsideration of Motion to Cancel Notices of Lis Pendens
42.	11/06/07	Letter from Mitchell Madden stating his opposition to the Motion for Reconsideration of Motion for Lis Pendens
43.	11/07/07	Notice of Appearance of Walter A. Herring and Melissa Davis as co-counsel for Mikob Properties, Inc., Allan Klein and Mitchell Kobernick
44.	11/12/07	Plaintiffs' Response to Defendants' Motion for Reconsideration of Motion to Cancel Notices of Lis Pendens
45.	11/12/09	Affidavit of Mitchell Kobernick
46.	11/13/07	International Realty Concepts, Inc.'s Original Petition in Intervention
47.	11/16/07	Defendants' Amended Motion for Partial Summary Judgment
48.	11/20/07	Defendants' Motion to Strike International Realty Concepts, Inc.'s Original Petition in Intervention
49.	11/26/07	Order Denying Plaintiff's Motion for Reconsideration to Cancel Lis Pendens
50.	11/26/07	Order – granting Defendants' Emergency Motion to Determine Adequate Protection Under Tex. Prop. Code §12.008(a) and to Cancel Plaintiffs' Notice of Lis Pendens
51.	11/28/07	Notice of Oral Hearing – on Amended Motion for Partial Summary Judgment
52.	11/28/07	Order – from the Fifth Court of Appeals
53.	11/30/07	Defendants' Emergency Motion to Cancel Notices of Lis Pendens in Light of Mandamus Ruling on Controlling Law Points
53A	11/30/07	Order of Direction from the Court of Appeals Regarding Lis Pendens
54.	11/30/07	Certified copy of Order of Direction from the Court of Appeals Regarding Lis Pendens
55.	11/30/07	Order – from the Fifth Court of Appeal
56.	11/30/07	Memorandum Opinion – from the Fifth Court of Appeal
57.	12/03/07	Affidavit of Mitchell Kobernick in regard to Application for Temporary Restraining Order
58.	12/03/07	Certificate of Conference

TAB #	DATE	EVENTS & ORDERS OF THE COURT
59.	12/03/07	Intervenor International Realty Concepts, Inc.'s Application for Temporary Restraining Order and Temporary and Permanent Injunctive Relief, or in the Alternative, Intervenor's Application for the Issuance of a Writ of Attachment
60.	12/03/07	International Realty Concepts, Inc.'s Amended Petition in Intervention
61.	12/04/07	Plaintiff's Emergency Motion for Expedited Discovery
62.	12/04/07	Motion for Protective Order
63.	12/04/07	Plaintiffs' Third Amended Petition, Application for Writs of Attachment or in the Alternative for a Temporary Restraining Order and Temporary and Permanent Injunctive Relief
64.	12/07/07	Allan Klein, Mitchell Kobernick, and Comunidad Balboa, LLC's Motion to Quash Notices of Deposition and Subpoena Duces Tecum and Motion for Protective Order
65.	12/07/07	Notice of Video Tape Deposition Duces Tecum of the Corporate Representative of Comunidad Balboa, LLC
66.	12/10/07	Defendants' Emergency (1) Request for Written Order, and (2) First Supplement to 11/30/07 Emergency Motion to Cancel Notices of Lis Pendens in Light of Mandamus Ruling on Controlling Law Points
67.	12/11/07	Defendants' Second Emergency (1) Request for Written Order, and (2) Second Supplement to 11/30/07 Emergency Motion to Cancel Notices of Lis Pendens in Light of Mandamus Ruling on Controlling Law
67A	12/14/07	Allan Klein and Mitchell Kobernick's Motion to Quash Amended Notices of Deposition and Subpoenae Duces Tecum and Motion for Protective Order
68.	12/14/07	Plaintiffs' Motion to Compel Written Discovery and Deposition Discovery from Defendants Mikob Properties, Inc., Mitchell Kobernick and Allan Klein and Emergency Motion to Shorten Time for Hearing
69.	12/14/07	Plaintiffs' Motion to Continue "Emergency" Hearing Set for December 17, 2007 at 10:00 A.M.
70.	12/17/07	Comunidad Balboa, LLC and Mikob Properties Inc.'s Objections and Motion to Quash Subpoenae Ad Testificandum and Duces Tecum and Motion for Protective Order
71.	12/17/07	Allan Klein and Mitchell Kobernick's Objections and Motion to Quash Subpoenae Ad Testificandum and Duces Tecum and Motion for Protective Order
72.	12/17/07	Order – Fifth Court of Appeals
73.	12/17/07	Memorandum Opinion – Fifth Court of Appeals
74.	12/17/07	Intervenor's Response to Defendants' Second Emergency (1) Request for Written Order, and (2) Second Supplement to 11/30/07 Emergency Motion to Cancel Lis Pendens in Light of Mandamus Ruling on Controlling Law Points
75.	12/18/07	Allan Klein and Mitchell Kobernick's Objections and Motion to Quash Subpoenae Ad Testificandum and Duces Tecum and Motion for Protective Order

TAB #	DATE	EVENTS & ORDERS OF THE COURT
76.	12/19/07	Plaintiffs' Letter Brief
77.	12/21/07	Notice of appointment of mediator
78.	12/21/07	Affidavit of Mitchell Kobernick
79.	12/21/07	Defendants' Motion to Transfer Venue
80.	12/21/07	Original Answer Subject to Motion to Transfer Venue
81.	12/26/07	Notice of Designation of Lead Counsel for Relators – Fifth Court of Appeals
82.	01/09/08	Amended Answer Subject to Motion to Transfer Venue
83.	01/14/08	Defendants' Amended Motion to Transfer Venue
84.	01/14/08	Notice of Oral Hearing
85.	01/25/08	Emergency Motion to Sever
86.	01/25/08	Amended Certificate of Conference to Intervenor's Motion to Sever
87.	01/29/08	Defendants' Preliminary Objection and Request for Protection Regarding January 2008 Amended Notices of Deposition Duces Tecum
88.	02/07/08	Citations and Return of Service for Fourth Amended Petition Served on Balboa Partners, Ltd.; BP Apt. Management, LC; KCP Management, LC; Oak Creek Management, Inc.; Oaks of Brittany Management, Inc.; Oaks of Brittany, Ltd.; S. Haven Management, LC; S. Haven Partners, Ltd.; F. Court Management, LC; F. Court Partners, Ltd.; Harbortree Apartments, Ltd.; Amherst Partners, Ltd.; AEP Management, LC; Ashford Est. Partners, Ltd.; Kensington Green (MK), Inc.; Kensington Green (AK), Inc.; Kensington Club Partners, Ltd; Kensington Club Apartments, Ltd.
89.	02/07/08	Plaintiffs' Fourth Amended Petition, Application for Writ of Attachment or in the Alternative for a Temporary Restraining Order and Temporary and Permanent Injunctive Relief
90.	02/20/08	Plaintiffs' Notice of Filing Rule 11 Agreement with Comunidad Corporation
91.	02/20/08	Plaintiffs' Notice of Filing Rule 11 Agreement with Mikob Properties, Allan Klein and Mitchell Kobernick
92.	02/20/08	Intervenor's Motion for Summary Judgment as to Counts I and II of Intervenor's Second Amended Petition in Intervention and Brief in Support
93.	02/22/08	IRC's Second Amended Petition in Intervention and Application for Writ of Attachment or in the Alternative for a Temporary Restraining Order and Temporary and Permanent Injunctive Relief
94.	02/25/08	Defendants Allan Klein, Mitchell Kobernick and Mikob Properties, Inc.'s Privilege Log

TAB #	DATE	EVENTS & ORDERS OF THE COURT
95.	03/03/08	Citations for Second Amended Petition Served on Balboa Partners, Ltd.; BP Apt. Management, LC; KCP Management, LC; Oak Creek Management, Inc.; Oaks of Brittany Management, Inc.; S. Haven Partners, Ltd.; F. Court Management, LC; F. Court Partners, Ltd.; Harbortree Apartments, Ltd.; Amherst Partners, Ltd.; AEP Management, LC; Ashford Est. Partners, Ltd.; Kensington Green (MK), Inc.; Kensington Green (AK), Inc.; Kensington Club Partners, Ltd; Kensington Club Apartments, Ltd.
96.	03/03/08	Answer of Defendants to Plaintiffs' Fourth Amended Petition Subject to Motion to Transfer Venue
97.	03/03/08	Plaintiffs' Motion to Enforce Rule 11 Agreements, to Compel Discovery and for Sanctions Against Defendants and Their Attorneys Pursuant to Rule 13 of the Texas Rules of Civil Procedure, Chapter 10 of the Texas Civil Practice and Remedies Code, Texas Rule of Civil Procedure 215 and the Court's Inherent Authority
98.	03/03/08	Unopposed Motion to Extend Deadline to Respond to Defendant's Motion to Transfer Venue
99.	03/07/08	Amended Certificate of Conference Plaintiffs' Motion to Enforce Rule 11 Agreements, to Compel Discovery and for Sanctions Against Defendants and Their Attorneys Pursuant to Rule 13 of the Texas Rules of Civil Procedure, Chapter 10 of the Texas Civil Practice and Remedies Code, Texas Rule of Civil Procedure 215 and the Court's Inherent Authority
100.	03/10/08	First Amended Certificate of Conference Plaintiffs' Motion to Enforce Rule 11 Agreements, to Compel Discovery and for Sanctions Against Defendants and Their Attorneys Pursuant to Rule 13 of the Texas Rules of Civil Procedure, Chapter 10 of the Texas Civil Practice and Remedies Code, Texas Rule of Civil Procedure 215 and the Court's Inherent Authority
101.	03/10/08	Second Amended Answer Subject to Motion to Transfer Venue
102.	03/11/08	Plaintiffs' Motion to Quash Notices of Intention to Take Video Deposition of Corporate Representative of 20/20 Management Company, Inc., Corporate Representative of St. Johns Holdings, Inc., Michael Neary, and Louis Reese
103.	03/12/08	Plaintiffs' Response in Opposition to Defendants' Amended Motion to Transfer Venue
104.	03/17/08	Defendants' Emergency (a) March 17, 3008 Status Update, (2) Third Written Request fro Order, and (3) Third Supplement to 11.30/07 Emergency Motion to Cancel Notices of Lis Pendens in Light of Mandamus Ruling on Controlling Law Points – All Subject to Pending Motion to Transfer Venue
105.	03/17/08	Defendants Mikob Properties, Inc., Mitchell Kobernick, Allan Klein's and Comunidad Corporation's, No Evidence and Traditional Motion for Summary Judgment

TAB #	DATE	EVENTS & ORDERS OF THE COURT
106.	03/17/08	Affidavit of Mitchell Kobernick
107.	03/17/08	Notice of Oral Hearing
108.	03/17/08	Defendants' Objections and Motion to Quash Deposition by Written Questions to Fidelity National Title Insurance Company and to Patriot Bank and Motion for Protective Order
109.	03/17/08	Intervenor International Realty Concepts, Inc.'s Response in Opposition to Defendants' Amended Motion to Transfer Venue
110.	03/18/08	Defendants' Motion to Transfer Venue
111.	03/18/08	Answer to Intervenor's Second Amended Petition in Intervention Subject to Motion to Transfer Venue
112.	03/20/08	Preliminary Response to Plaintiffs' Libelous March 3 rd "Motion for Sanctions" and Continuing Request for Conference Under the Local Rules
113.	03/24/08	Defendants Allan Klein, Mitchell Kobernick, and Mikob Properties, Inc.'s Supplemental Designation of Expert Witnesses
114.	03/24/08	Plaintiffs' Response in Opposition to Defendants' Emergency (1) March 17, 2008 Status Update, (2) Third Written Request for Order, and (3) Third Supplement to 11/30/07 Emergency Motion to Cancel Notices of Lis Pendens in Light of Mandamus Ruling on Controlling Law Points
114A	03/25/08	Plaintiffs' Response in Opposition to Defendants' Emergency (1) March 17, 2008 Status Update, (2) Third Written Request for Order, and (3) Third Supplement to 11/30/07 Emergency Motion to Cancel Notices of Lis Pendens in Light of Mandamus Ruling on Controlling Law Points
115.	03/25/08	Defendants' Motion to Transfer Venue
116.	03/25/08	Answer of Defendants to International Realty Concepts, Inc.'s Second Amended Petition in Intervention Subject to Motion to Transfer Venue
117.	04/03/08	Defendants' Objections and Motion to Quash Subpoenas to Fidelity National Title Insurance Company, to Patriot Bank Richard Melamed, Dan Platt, and Debbie Barela and Motion for Protective Order
118.	04/04/08	Defendant's Preliminary Response in Opposition to Plaintiffs' Libelous and Bad Faith March 3 rd Motion to Compel/For Sanctions (Subject to Defendants' Pending Motion to Transfer Venue)

EXHIBIT B

CASE SUMMARY

20/20 MANAGEMENT COMPANY ,INC.
vs.
MIKOB PROPERTIES,INC.

www.wwsnp.com

Location: **134th District Court**
Judicial Officer: **ASHBY, ANNE**
Filed on: **12/29/2005**

CASE INFORMATION

Case Type: **DEBT/CONTRACT**

PARTY INFORMATION

PLAINTIFF 20/20 MANAGEMENT COMPANY, INC.

Lead Attorneys
MADDEN, MITCHELL 972-484-7780
Retained

NEARY, MICHAEL

MADDEN, MITCHELL 972-484-7780
Retained

ST JOHNS HOLDINGS INC

MADDEN, MITCHELL 972-484-7780
Retained

DEFENDANT AEP MANAGEMENT LC

AMHERST PARTNERS LTD

ASHFORD EST PARTNERS LTD

BALBOA PARTNERS LTD

BP APT MANAGEMENT LC

COMUNIDAD BALBOA LLC**COMUNIDAD CORPORATION**

EATON, MICHAEL W 817-410-9500
Retained

F COURT MANAGEMENT LC

F COURT PARTNERS LTD

HARBORTREE APARTMENTS LTD

KCP MANAGEMENT LC

KENSINGTON CLUB APARTMENTS LTD

KENSINGTON CLUB PARTNERS LTD

KENSINGTON GREEN (AK) INC**KENSINGTON GREEN (MK) INC**

KLEIN, ALLEN

KOBERNICK, MITCHELL

MIKOB PROPERTIES, INC.

Exhibit B

CASE SUMMARY

CASE NO. DC-05-12895

MIKOB, LTD.

MITCHELL KOBERNICK, AS GENERAL PARTNER

OAK CREEK MANAGEMENT INC

OAKS OF BRITTANY LTD

OAKS OF BRITTANY MANAGEMENT INC

PRESTON AFFILIATES INC

S HAVEN MANAGEMENT LC

S HAVEN PARTNERS LTD

THIRD PARTY	COMUNDIAD KENSINGTON CLUB II, LLC	SANDERS, MARK ALAN 713-468-7700 <i>Retained</i>
	COMUNIDAD CAPITAL, LLC	SANDERS, MARK ALAN 713-468-7700 <i>Retained</i>
	COMUNIDAD HARBORTREE, LLC	
	COMUNIDAD KENSINGTON CLUB I, LLC	SANDERS, MARK ALAN 713-468-7700 <i>Retained</i>
	COMUNIDAD STONEHAVEN, LLC	SANDERS, MARK ALAN 713-468-7700 <i>Retained</i>
	COMUNIDAD WISTERIA GARDENS, LLC	SANDERS, MARK ALAN 713-468-7700 <i>Retained</i>

DATE	EVENTS & ORDERS OF THE COURT	INDEX
12/29/2005	ORIGINAL PETITION (OCA)	
12/29/2005	JURY DEMAND (OCA) Party: PLAINTIFF 20/20 MANAGEMENT COMPANY ,INC.	Vol./Book J22, Page 302, 1 pages
12/29/2005	ISSUE CITATION	
12/30/2005	CITATION MIKOB PROPERTIES, INC. served 05/09/2006 MIKOB, LTD. served 05/09/2006 KOBERNICK, MITCHELL served 05/09/2006 KLEIN, ALLEN served 05/09/2006 COMUNIDAD CORPORATION unserved MITCHELL KOBERNICK, AS served 05/09/2006 GENERAL PARTNER	
12/30/2005	ISSUE CITATION	
02/28/2006	ORIGINAL ANSWER - GENERAL DENIAL Party: DEFENDANT COMUNIDAD CORPORATION COMUNIDAD CORPORATION	
03/28/2006	MOTION - SUBSTITUE SERVICE	

CASE SUMMARY **CASE NO. DC-05-12895**

	Party: PLAINTIFF 20/20 MANAGEMENT COMPANY ,INC.	
04/07/2006	ORDER - SUBSTITUTE SERVICE	Vol./Book 361G, Page451, 1 pages
06/06/2006	ORIGINAL ANSWER - GENERAL DENIAL Party: DEFENDANT MIKOB PROPERTIES,INC.; DEFENDANT KOBERNICK, MITCHELL; DEFENDANT KLEIN, ALLEN	
06/13/2006	ORDER - MEDIATION	Vol./Book 364G, Page242, 2 pages
06/23/2006	DESIGNATE LEAD COUNSEL Party: PLAINTIFF 20/20 MANAGEMENT COMPANY ,INC.	
09/20/2006	RULE 11	
09/26/2006	SCHEDULING ORDER	Vol./Book 367G, Page473, 1 pages
10/09/2006	CANCELED Jury Trial - Civil CASE TRIAL RESET	
10/27/2006	DESIGNATION OF EXPERT WITNESS(ES)	
12/01/2006	DESIGNATION OF EXPERT WITNESS(ES) <i>DFTS</i>	
12/14/2006	MOTION - PROTECT Party: DEFENDANT COMUNIDAD CORPORATION	
01/10/2007	RULE 11 <i>PLTF</i>	
02/20/2007	MOTION - CONTINUANCE Party: PLAINTIFF 20/20 MANAGEMENT COMPANY ,INC.; DEFENDANT MIKOB PROPERTIES,INC. <i>AGREED CONTINUANE</i>	
02/20/2007	MOTION - CONTINUANCE Party: PLAINTIFF 20/20 MANAGEMENT COMPANY ,INC.	
02/26/2007	TRIAL SETTING (JURY)	
02/26/2007	Jury Trial - Civil (9:00 AM) (Judicial Officer: ASHBY, ANNE)	
03/20/2007	AMENDED PETITION Party: PLAINTIFF 20/20 MANAGEMENT COMPANY ,INC.	
03/30/2007	MOTION - COMPEL Party: PLAINTIFF 20/20 MANAGEMENT COMPANY ,INC. <i>PLTF-DISCOVERY FROM DEFT COMUNIDAD CORP & REQUEST FOR SANCTIONS</i>	
04/09/2007	Scheduling Conference (9:45 AM) (Judicial Officer: ASHBY, ANNE) <i>PLTF-AMD DOCKET CONTROL ORD-15M</i>	
04/23/2007	Pre-Trial Hearing (1:00 PM) (Judicial Officer: ASHBY, ANNE) <i>PLTF-PRE-TRIAL ORD-30M</i>	

CASE SUMMARY **CASE NO. DC-05-12895**

04/30/2007	MISCELLANEOUS EVENT Party: DEFENDANT MIKOB PROPERTIES, INC.; DEFENDANT KOBERNICK, MITCHELL; DEFENDANT KLEIN, ALLEN; DEFENDANT COMUNIDAD CORPORATION DEFTS-M/CANCEL/NOTICES/LIS PENDENS
05/15/2007	NOTICE OF HEARING / FIAT
06/10/2007	NOTE - CLERKS *****BEGIN JCKT#2*****
06/11/2007	RESPONSE PLTF-TO M/CANCEL NOTICES OF LIS PENDENS
06/11/2007	RESPONSE PLTF-M/CANCEL/NOTICES/LIS PENDENS
06/11/2007	AMENDED PETITION Party: PLAINTIFF 20/20 MANAGEMENT COMPANY, INC. PLTF-2ND
06/11/2007	MOTION HEARING (2:30 PM) (Judicial Officer: ASHBY, ANNE) DEFTS-M/CANCEL N/LIS PENDENS-30M
07/19/2007	ORDER - MISC. PLTF-AGRD CONFIDENTIALITY & PROTECTIVE ORD
07/24/2007	NOTE - CLERKS SENT COPY OF CONFIDENTIALITY ORDER SIGNED 7/19 ATTY-MADDEN
08/20/2007	CANCELED Jury Trial - Civil CASE TRIAL RESET
08/21/2007	NOTICE OF HEARING / FIAT DEFT
08/21/2007	MOTION - MISCELLANEOUS Party: DEFENDANT MIKOB PROPERTIES, INC. DEFTS-MIKOB PROPERTIES INC-EMERGENCY M/DETERMINE ADEQUATE PROTECTION & TO CANCEL N/LIS PENDENS
08/21/2007	NO EVIDENCE MOTION FOR SUMMARY JUDGMENT Party: DEFENDANT MIKOB PROPERTIES, INC.; DEFENDANT KLEIN, ALLEN; DEFENDANT MITCHELL KOBERNICK, AS GENERAL PARTNER DEFTS-MIKOB PROPERTIES INC
08/21/2007	AFFIDAVIT Party: DEFENDANT MIKOB PROPERTIES, INC. JOHN MARTIN
08/21/2007	AFFIDAVIT Party: DEFENDANT MIKOB PROPERTIES, INC. MITCHELL KOBERNICK
08/23/2007	CANCELED MOTION HEARING REQUESTED BY ATTORNEY/PRO SE DEFT-EMERGENCY M/DETERMINE ADEQUATE PROTECTION & TO CANCEL NOTICES OF LIS PEDENS-1 1/2 HRS

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 Page 192, 10
 pages

CASE SUMMARY
CASE No. DC-05-12895

10/09/2007	MOTION - CONTINUANCE Party: PLAINTIFF 20/20 MANAGEMENT COMPANY ,INC. <i>AND ENTRY OF NEW SCHEDULING ORDER</i>	
10/16/2007	ORDER - GRANTING CONTINUANCE	Vol./Book 382G, Page70, 1 pages
10/19/2007	MOTION - RECONSIDER Party: DEFENDANT MIKOB PROPERTIES,INC.; DEFENDANT KOBERNICK, MITCHELL; DEFENDANT KLEIN, ALLEN; DEFENDANT COMUNIDAD CORPORATION <i>M/CANCEL NOTICES LIS PENDENS</i>	
10/25/2007	CERTIFICATE OF CONFERENCE <i>DEFT</i>	
10/29/2007	CANCELED Jury Trial - Civil <i>CASE TRIAL RESET</i>	
11/07/2007	NOTICE OF APPEARANCE Party: DEFENDANT MIKOB PROPERTIES,INC.; DEFENDANT KLEIN, ALLEN; DEFENDANT MITCHELL KOBERNICK, AS GENERAL PARTNER	
11/12/2007	RESPONSE <i>PLTF-M/RECONSIDERATION OF M/CANCEL NOTICES OF LIS PENDENS</i>	
11/12/2007	AFFIDAVIT Party: DEFENDANT MIKOB PROPERTIES,INC. <i>MITCHELL KOBERNICK</i>	
11/12/2007	Motion - Reconsider (3:00 PM) (Judicial Officer: ASHBY, ANNE) <i>DEFT-M/CANCEL LIS PENDENS-30M</i>	
11/13/2007	INTERVENTION	
11/16/2007	MOTION - PARTIAL SUMMARY JUDGMENT Party: DEFENDANT MIKOB PROPERTIES,INC. <i>DEFT-AMD</i>	
11/16/2007	Scheduling Conference (3:30 PM) (Judicial Officer: ASHBY, ANNE) <i>-PER AA-CONFERENCE CALL-30M</i>	
11/20/2007	MOTION - STRIKE Party: DEFENDANT KLEIN, ALLEN <i>DFTS-ORIG PET/INTERVENTION</i>	
11/26/2007	ORDER - DENY <i>PLTF-M/RECONSIDERATION TO CANCEL LIS PENDENS</i>	Vol./Book 383G, Page440, 1 pages
11/26/2007	ORDER - MISC. <i>DEFT-EMERGENCY M/DETERMINE ADEQUATE PROTECTION</i>	Vol./Book 383G, Page441, 1 pages
11/26/2007	MOTION HEARING (3:45 PM) (Judicial Officer: ASHBY, ANNE) <i>DEFT-MIKOB-M/DETERMINE ADEQUATE PROTECTION-30M</i>	
11/28/2007	NOTICE OF HEARING / FIAT	

CASE SUMMARY **CASE No. DC-05-12895**

11/30/2007 MISCELLANEOUS EVENT
 Party: PLAINTIFF 20/20 MANAGEMENT COMPANY ,INC.
 COA ORDER

11/30/2007 MOTION - MISCELLANEOUS
 Party: DEFENDANT MIKOB PROPERTIES,INC.; DEFENDANT KOBERNICK,
 MITCHELL; DEFENDANT KLEIN, ALLEN
 DEFTS-EMERGENCY M/CANCEL N/LIS PENDENS IN LIGHT OF MANDAMUS RULING
 ON CONTROLLING LAW POINTS

11/30/2007 MISCELLANEOUS EVENT
 Party: PLAINTIFF 20/20 MANAGEMENT COMPANY ,INC.
 COA ORDER

11/30/2007 ORDER - MISC.

 -OF DIRECTION FROM THE CT OF APPEALS REGARDING LIS PENDENS

12/03/2007 MISCELLANEOUS EVENT
 Party: PLAINTIFF 20/20 MANAGEMENT COMPANY ,INC.
 COA ORDER

12/03/2007 OPINION
 COA OPINION

12/03/2007 AFFIDAVIT
 Party: DEFENDANT MITCHELL KOBERNICK, AS GENERAL PARTNER

12/03/2007 CERTIFICATE OF CONFERENCE

12/03/2007 APPLICATION - TEMPORARY RESTRAINING ORDER
 INTERVENOR

12/03/2007 ISSUE CITATION

12/03/2007 INTERVENTION
 Party: INTERVENOR INTERNATIONAL REALTY CONCEPTS INC
 INTERVENOR-AMD

12/04/2007 ISSUE CITATION

12/04/2007 **CITATION**
 COMUNIDAD CAPITAL,LLC served 12/05/2007
 COMUNIDAD HARBORTREE,LLC served 12/05/2007
 COMUNIDAD KENSINGTON CLUB
 I,LLC served 12/05/2007
 COMUNDIAD KENSINGTON CLUB II,
 LLC served 12/05/2007
 COMUNIDAD STONEHAVEN,LLC served 12/05/2007
 COMUNIDAD WISTERIA
 GARDENS,LLC served 12/05/2007
 THIRD AMENDED

12/04/2007 MISCELLANEOUS EVENT
 Party: PLAINTIFF 20/20 MANAGEMENT COMPANY ,INC.
 PLTF-EMERGE3NCY/M/EXPEDITED DISCOVERY

12/04/2007 MOTION - PROTECT
 Party: DEFENDANT COMUNIDAD CORPORATION

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CASE SUMMARY **CASE No. DC-05-12895**

12/04/2007	AMENDED PETITION Party: PLAINTIFF 20/20 MANAGEMENT COMPANY ,INC. PLTF-3RD/APPL/WRITS/ATTACHMENT
12/04/2007	NOTE - CLERKS *****BEGIN JCKT#3*****
12/07/2007	MOTION - QUASH Party: DEFENDANT KOBERNICK, MITCHELL; DEFENDANT KLEIN, ALLEN -NOTICES OF DEPO & SUBPOENAE DUCES TECUM & M/PROTECTIVE ORD
12/07/2007	MISCELLANEOUS EVENT Party: PLAINTIFF 20/20 MANAGEMENT COMPANY ,INC. PLTF-N/VIDEO TAPE DEPO DUCES TECUM-CORPORATE REPRESENTATIVE OF COMUNIDAD BALBOA LLC
12/10/2007	MOTION - ENTER ORDER Party: DEFENDANT MIKOB PROPERTIES,INC.; DEFENDANT KOBERNICK, MITCHELL; DEFENDANT KLEIN, ALLEN DEFTS-EMERGENCY REQ WRITTEN ORD & 1ST SUPPL TO 11/30/07 M/CANCEL NOTICES OF LIS PENDENS IN LIGHT OF MANDUMS RULING ON CONTROLLING LAW POINTS
12/11/2007	MOTION - COMPEL Party: DEFENDANT MIKOB PROPERTIES,INC.; DEFENDANT KOBERNICK, MITCHELL; DEFENDANT KLEIN, ALLEN 2ND EMERGENCY (1) REQUEST FOR WRITTEN ORD AND (2) SECOND SUPPL TO 11/30/07 EMERGENCY M/CANCEL NOTICES OF LIS PENDENS IN LIGHT OF MANDAMUS RULING ON CONTROLLING LAW POINTS
12/14/2007	MOTION - QUASH Party: DEFENDANT KOBERNICK, MITCHELL; DEFENDANT KLEIN, ALLEN AMD/NOTICE/DEPO
12/14/2007	MOTION - COMPEL Party: PLAINTIFF 20/20 MANAGEMENT COMPANY ,INC. DISCOVERY/DEPO/EMERGENCY/M/ SHORTEN TIME FOR HEARING IN ACCRD
12/14/2007	MOTION - CONTINUANCE Party: PLAINTIFF 20/20 MANAGEMENT COMPANY ,INC. PLTF-EMERGENCY HEARING
12/17/2007	OBJECTION DFTS-M/QUASH/PROTECTIVE
12/17/2007	MISCELLANEOUS EVENT Party: DEFENDANT KOBERNICK, MITCHELL; DEFENDANT KLEIN, ALLEN COA-ORDER-DENY
12/17/2007	MISCELLANEOUS EVENT Party: DEFENDANT KOBERNICK, MITCHELL; DEFENDANT KLEIN, ALLEN COA-MEMO-DENY
12/17/2007	RESPONSE 1/2ND/EMERGENCY/M/CANCEL LIS PENDENS IN LIGHT OF MANDAMUS RULING
12/17/2007	MOTION HEARING (10:00 AM) (Judicial Officer: ASHBY, ANNE) DEFT-2ND EMERGENCY REQ WRITTEN ORD TO EMERGENCY M/CANCEL NOTICES LIS PENDENS-30M

CASE SUMMARY **CASE No. DC-05-12895**

12/18/2007	OBJECTION <i>DFTS-M/QUASH-2</i>
12/19/2007	CANCELED Motion - Strike <i>REQUESTED BY ATTORNEY/PRO SE</i> <i>DEFT-ALLAN KLEIN, MITCHELL KOBERNICK & MIKOB PROPERTIES-ORIG PET IN INTERVENTION-30M</i>
12/19/2007	BRIEF FILED Party: PLAINTIFF 20/20 MANAGEMENT COMPANY ,INC. <i>LETTER BRIEF</i>
12/21/2007	ORDER - MEDIATION
12/21/2007	AFFIDAVIT Party: THIRD PARTY COMUNDIAD KENSINGTON CLUB II, LLC
12/21/2007	MOTION - TRANSFER - CHANGE OF VENUE Party: THIRD PARTY COMUNIDAD KENSINGTON CLUB I,LLC
12/21/2007	ORIGINAL ANSWER - GENERAL DENIAL Party: THIRD PARTY COMUNIDAD CAPITAL,LLC; THIRD PARTY COMUNIDAD KENSINGTON CLUB I,LLC; THIRD PARTY COMUNIDAD STONEHAVEN,LLC; THIRD PARTY COMUNIDAD WISTERIA GARDENS,LLC <i>SUBJECT TO TRSF VENUE</i>
12/26/2007	DESIGNATE LEAD COUNSEL Party: DEFENDANT MIKOB PROPERTIES,INC.; DEFENDANT KOBERNICK, MITCHELL; DEFENDANT KLEIN, ALLEN
01/09/2008	AMENDED ANSWER - AMENDED GENERAL DENIAL Party: THIRD PARTY COMUNIDAD CAPITAL,LLC; THIRD PARTY COMUNIDAD HARBORTREE,LLC; THIRD PARTY COMUNIDAD KENSINGTON CLUB I,LLC; THIRD PARTY COMUNDIAD KENSINGTON CLUB II, LLC; THIRD PARTY COMUNIDAD STONEHAVEN,LLC; THIRD PARTY COMUNIDAD WISTERIA GARDENS,LLC <i>SUBJECT TO M/TRSF VENUE</i>
01/14/2008	MOTION - TRANSFER - CHANGE OF VENUE Party: THIRD PARTY COMUNIDAD CAPITAL,LLC; THIRD PARTY COMUNIDAD HARBORTREE,LLC; THIRD PARTY COMUNIDAD KENSINGTON CLUB I,LLC; THIRD PARTY COMUNDIAD KENSINGTON CLUB II, LLC; THIRD PARTY COMUNIDAD STONEHAVEN,LLC; THIRD PARTY COMUNIDAD WISTERIA GARDENS,LLC
01/14/2008	NOTICE OF HEARING / FIAT
01/15/2008	CANCELED Motion - Partial Summary Judgment <i>REQUESTED BY ATTORNEY/PRO SE</i> <i>DEFT-AMD-45M</i>
01/25/2008	MOTION - SEVER Party: INTERVENOR INTERNATIONAL REALTY CONCEPTS INC <i>EMERGENCY</i>
01/25/2008	CERTIFICATE OF CONFERENCE <i>INTERVENOR/AMD</i>
01/29/2008	OBJECTION <i>DFTS-PROTECTION</i>

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CASE SUMMARY **CASE No. DC-05-12895**

01/29/2008	OBJECTION <i>REQUEST PRODUCTION</i>
01/30/2008	CANCELED Motion - Sever <i>HEARING RESCHEDULED</i> <i>INTERVENOR-EMERGENCY-30M</i>
02/05/2008	CANCELED Motion - Sever <i>REQUESTED BY ATTORNEY/PRO SE</i> <i>INTERVENOR-EMERGENCY-30M</i>
02/07/2008	ISSUE CITATION
02/07/2008	CITATION BALBOA PARTNERS LTD served 02/08/2008 BP APT MANAGEMENT LC unserved KCP MANAGEMENT LC served 02/08/2008 OAK CREEK MANAGEMENT INC served 02/08/2008 OAKS OF BRITTANY MANAGEMENT INC served 02/08/2008 OAKS OF BRITTANY LTD served 02/08/2008 S HAVEN MANAGEMENT LC served 02/08/2008 S HAVEN PARTNERS LTD served 02/08/2008 F COURT MANAGEMENT LC served 02/08/2008 F COURT PARTNERS LTD served 02/08/2008 HARBORTREE APARTMENTS LTD served 02/08/2008 AMHERST PARTNERS LTD served 02/08/2008 AEP MANAGEMENT LC served 02/08/2008 ASHFORD EST PARTNERS LTD served 02/08/2008 KENSINGTON GREEN (MK) INC served 02/08/2008 KENSINGTON GREEN (AK) INC served 02/08/2008 KENSINGTON CLUB PARTNERS LTD served 02/08/2008 KENSINGTON CLUB APARTMENTS LTD served 02/08/2008 PRESTON AFFILIATES INC served 02/12/2008 <i>4TH AMD - 19 CIT/ATTY</i>
02/07/2008	AMENDED PETITION <i>4TH AMEND</i>
02/20/2008	RULE 11
02/20/2008	RULE 11
02/22/2008	ISSUE CITATION
02/22/2008	MOTION - SUMMARY JUDGMENT Party: INTERVENOR INTERNATIONAL REALTY CONCEPTS INC <i>INTERVENOR/AS TO COUNTS I, II/2ND AMD PET</i>
02/22/2008	AMENDED PETITION Party: INTERVENOR INTERNATIONAL REALTY CONCEPTS INC
02/25/2008	MISCELLANEOUS EVENT Party: DEFENDANT KLEIN, ALLEN <i>PRIVILEGE LOG</i>
02/26/2008	CITATION

CASE SUMMARY CASE No. DC-05-12895

BALBOA PARTNERS LTD unserved
BP APT MANAGEMENT LC unserved
KCP MANAGEMENT LC unserved
OAK CREEK MANAGEMENT INC unserved
OAKS OF BRITTANY MANAGEMENT INC unserved
S HAVEN PARTNERS LTD unserved
F COURT MANAGEMENT LC unserved
F COURT PARTNERS LTD unserved
HARBORTREE APARTMENTS LTD unserved
AMHERST PARTNERS LTD unserved
AEP MANAGEMENT LC unserved
ASHFORD EST PARTNERS LTD unserved
KENSINGTON GREEN (MK) INC unserved
KENSINGTON GREEN (AK) INC unserved
KENSINGTON CLUB PARTNERS LTD unserved
KENSINGTON CLUB APARTMENTS LTD unserved
PRESTON AFFILIATES INC unserved
2 AMENDED

03/03/2008 AMENDED ANSWER - AMENDED GENERAL DENIAL
Party: DEFENDANT MIKOB PROPERTIES, INC.; DEFENDANT KOBERNICK, MITCHELL; DEFENDANT KLEIN, ALLEN

03/03/2008 MISCELLANEOUS EVENT
Party: PLAINTIFF 20/20 MANAGEMENT COMPANY, INC.
PLTF-M/ENFORCE/RULE 11

03/03/2008 MISCELLANEOUS EVENT
Party: PLAINTIFF 20/20 MANAGEMENT COMPANY, INC.
PLTF-APPENDIX TO M/ENFORCE/RULE 11

03/06/2008 MOTION - EXTEND
INTERVENOR/DEADLINE RESPOND

03/07/2008 CERTIFICATE OF CONFERENCE
PLTF-AMD/TO M/ENFORCE RULE AGRMT

03/09/2008 NOTE - CLERKS
BEGIN JCKT# 5

03/10/2008 CERTIFICATE OF CONFERENCE
AMENDED

03/10/2008 AMENDED ANSWER - AMENDED GENERAL DENIAL
Party: DEFENDANT COMUNIDAD BALBOA LLC
SUBJECT TO M/TRSF VENUE

03/11/2008 MOTION - QUASH
Party: PLAINTIFF 20/20 MANAGEMENT COMPANY, INC.
PLTF-DEPO

03/12/2008 RESPONSE
PLTF-OPPOSITION/AMD/M/TRSF/VENUE

03/13/2008 NOTE - CLERKS
*****BEGIN JCKT#6*****

03/17/2008 MISCELLANEOUS EVENT

CASE SUMMARY**CASE No. DC-05-12895**

Party: DEFENDANT MIKOB PROPERTIES, INC.; DEFENDANT KOBERNICK, MITCHELL; DEFENDANT KLEIN, ALLEN
DFTS-EMERGENCY MARCH 17, 2008 STATUS UPDATE

03/17/2008	NO EVIDENCE MOTION FOR SUMMARY JUDGMENT Party: DEFENDANT MIKOB PROPERTIES, INC.; DEFENDANT KOBERNICK, MITCHELL; DEFENDANT KLEIN, ALLEN; DEFENDANT COMUNIDAD CORPORATION <i>DEFTS-& TRADITIONAL MSJ</i>
03/17/2008	AFFIDAVIT Party: DEFENDANT KOBERNICK, MITCHELL <i>DEFT-MITCHELL KOBERNICK</i>
03/17/2008	NOTICE OF HEARING / FIAT <i>DEFT</i>
03/17/2008	OBJECTION <i>DFTS-M/QUASH/DEPO/PROTECTIVE</i>
03/17/2008	RESPONSE <i>INTERVENOR/OPPOSITION/AMD/M/TRSF/VENUE</i>
03/18/2008	MOTION - TRANSFER - CHANGE OF VENUE Party: DEFENDANT COMUNIDAD BALBOA LLC
03/18/2008	ORIGINAL ANSWER - DEFENDANT <i>DFTS-INTERVENOR/2ND/AMD/PET/INTERVENTION/M/TRSF/VENUE</i>
03/20/2008	RESPONSE <i>PRELIMINARY/LIBELOUS MARCH 3RD M/SANCTIONS</i>
03/21/2008	NOTE - CLERKS *****BEGIN JCKT #7*****
03/24/2008	DESIGNATION OF EXPERT WITNESS(ES) <i>DFTS-SUPPL</i>
03/24/2008	RESPONSE <i>PLTF-IN OPPOSITION TO DEFTS' EMERGENCY 3/17/08 STATUS UPDATE</i>
03/24/2008	Status Conference (3:00 PM) (Judicial Officer: ASHBY, ANNE) -2HRS
03/25/2008	RESPONSE <i>PLTF-OPPOSITION</i>
03/25/2008	MOTION - TRANSFER - CHANGE OF VENUE Party: DEFENDANT BALBOA PARTNERS LTD
03/25/2008	ORIGINAL ANSWER - DEFENDANT <i>TO 2ND/AMD/PET/INTERVENTION</i>
04/07/2008	CANCELED Motion - Transfer HEARING RESCHEDULED DEFT-AMD-COMMUNIDAD BALBOA-30M
04/21/2008	CANCELED Motion - Compel HEARING RESCHEDULED PLTF-DISCOVERY, M/SANCTIONS & M/ENFORCE RULE 11 AGREEMENT-45M

CASE SUMMARY**CASE NO. DC-05-12895**

05/12/2008	Motion - Compel (10:00 AM) (Judicial Officer: ASHBY, ANNE) <i>PLTF-DISCOVERY, M/SANCTIONS, DEFT'S M/TRANSFER VENUE & D/MSJ-NO EVID & TRADITIONAL-(MIKOB PROPERTIES, MITCHELL KOBERNICK, COMMUNIAD CORP. & ALLEN KLEIN)-6HRS</i>
05/19/2008	TRIAL SETTING (JURY)
05/19/2008	Jury Trial - Civil (9:00 AM) (Judicial Officer: ASHBY, ANNE)

DATE		FINANCIAL INFORMATION	
INTERVENOR INTERNATIONAL REALTY CONCEPTS INC			
	Total Charges		217.00
	Total Payments and Credits		217.00
	Balance Due as of 3/31/2008		0.00
11/13/2007	Charge	INTERVENOR INTERNATIONAL REALTY CONCEPTS INC	25.00
11/13/2007	PAYMENT	Receipt # 65001-2007-DCLK INTERVENOR INTERNATIONAL REALTY CONCEPTS INC	(25.00)
	(CASE FEES)		
12/03/2007	Charge	INTERVENOR INTERNATIONAL REALTY CONCEPTS INC	56.00
12/03/2007	PAYMENT	Receipt # 68563-2007-DCLK INTERVENOR INTERNATIONAL REALTY CONCEPTS INC	(56.00)
	(CASE FEES)		
02/22/2008	Charge	INTERVENOR INTERNATIONAL REALTY CONCEPTS INC	136.00
02/25/2008	PAYMENT	Receipt # 11419-2008-DCLK INTERVENOR INTERNATIONAL REALTY CONCEPTS INC	(136.00)
	(CASE FEES)		
PLAINTIFF 20/20 MANAGEMENT COMPANY ,INC.			
	Total Charges		490.00
	Total Payments and Credits		490.00
	Balance Due as of 3/31/2008		0.00
12/29/2005	Charge	PLAINTIFF 20/20 MANAGEMENT COMPANY ,INC.	212.00
12/29/2005	Charge	PLAINTIFF 20/20 MANAGEMENT COMPANY ,INC.	78.00
12/29/2005	PAYMENT	Receipt # 18555-2005-DCLK PLAINTIFF 20/20 MANAGEMENT COMPANY ,INC.	(290.00)
	(CASE FEES)		
12/04/2007	Charge	PLAINTIFF 20/20 MANAGEMENT COMPANY ,INC.	48.00
12/04/2007	PAYMENT	Receipt # 68580-2007-DCLK PLAINTIFF 20/20 MANAGEMENT COMPANY ,INC.	(48.00)
	(CASE FEES)		
02/07/2008	Charge	PLAINTIFF 20/20 MANAGEMENT COMPANY ,INC.	152.00
02/07/2008	PAYMENT	Receipt # 7724-2008-DCLK PLAINTIFF 20/20 MANAGEMENT COMPANY ,INC.	(152.00)
	(CASE FEES)		

EXHIBIT C

**Exhibit "C" Appears In Separately Bound
Multiple Volumes Included With This Submission**

EXHIBIT D

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

20/20 MANAGEMENT CO. ET AL.,

§

Plaintiffs

§

VS.

§

Civil Action No. _____

COMUNIDAD CORPORATION,
MIKOB PROPERTIES, INC., ALLAN KLEIN,
and MITCHELL KOBERNICK, ET AL.

§

§

Defendants

§

DEFENDANTS' CERTIFICATE OF INTERESTED PERSONS

Defendants Mikob Properties, Inc., Allan Klein, and Mitchell Kobernick files their certificate of interested persons, association of persons, firms, partnership, corporations, affiliates, parent corporations, and other entities that are financially interested in the outcome of this litigation. Any corporation whose securities are publicly traded has been underlined:

1. 20/20 Management, Inc.
2. St. Johns Holdings, Inc.
3. Michael Neary
4. Mikob Properties, Inc.
5. Allan Klein
6. Mitchell Kobernick
7. Comunidad Corporation
8. Comunidad Balboa, LLC
9. Comunidad Kensington Club II, LLC
10. Comunidad Harbortree, LLC
11. Comunidad Capital LLC
12. Comunidad Stonehaven, LLC
13. Comunidad Wisteria Gardens, LLC
14. BP Apt. Management, L.C.
15. KCP Management, L.C.
16. O. Creek Management, Inc.
17. Oaks of Brittany Management, Inc.
18. Oaks of Brittany, Ltd.

19. S. Haven Management, L.C.
20. S. Haven Partners, Ltd.
21. F. Court Management, L.C.
22. F. Court Partners Management, L.C.
23. Ashford Est. Partners, Ltd.
24. Kensington Green (MK), Inc.
25. Kensington Green (AK), Inc.
26. Kensington Club Partners, Ltd.
27. Kensington Club Apartments, Ltd.

Certified on this 8 day of April, 2008.

Respectfully submitted,

LAW OFFICE OF MARK A. SANDERS

By:



Mark A. Sanders
State Bar No.: 17600500
11451 Katy Freeway, Suite 501
Houston, Texas 77079
Telephone: 713-468-7700
Facsimile: 713-468-7701

***Counsel for Defendant
Comunidad Kensington Club I, LLC***

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document has been delivered by facsimile, according to the Federal Rules of Procedure, on this 9th day of April, 2008:

^ and/or hand delivery

Mitchell Madden
MADDEN SEWELL, L.L.P.
Four Hickory Centre
1755 Whittington Place, Suite 300
Dallas, Texas 75234
Counsel for Plaintiffs
20/20 Management Company
St. John's Holdings, Inc.
Michael Neary

Michael W. Eaton
State Bar No. 06383800
Joel B. Bishop
State Bar No. 24006848
EATON & BISHOP, PLLC
1310 N. White Chapel Road, Suite 200
Southlake, Texas 76092
Telephone: 817-410-9500
Telecopier: 817-410-9525
Counsel for Defendant
Comunidad Corporation

Lawrence J. Friedman
Bart F. Higgins
R. Brian Shields
FRIEDMAN & FEIGER, L.L.P.
5301 Spring Valley Road, Suite 200
Dallas, Texas 75254
Counsel for Intervenor
International Realty Concepts, Inc.



Mark A. Sanders

JS 44 (Rev. 12/07)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS

20/20 Management Inc. et al.

308 CV - 608 - 0

(b) County of Residence of First Listed Plaintiff Dallas
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number)

Mitchell Madden

1755 Whittington Place, Suite 300, Dallas, TX 75234 972-484-7788

DEFENDANTS

Comunidad Corporation, Mikob Properties, Inc., Allan Klein and Mitchell Kobernick, et al.

County of Residence of First Listed Defendant

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.

Attorneys (If Known)

Mark A. Sanders, 11451 Katy Freeway, Suite 501, Houston, TX 77079 713-468-7700

II. BASIS OF JURISDICTION

(Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES

(For Diversity Cases Only)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT

(Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input checked="" type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury	PERSONAL INJURY <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes

V. ORIGIN

(Place an "X" in One Box Only)

- ☐ 1 Original Proceeding
- ☒ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from another district (specify)
- ☐ 6 Multidistrict Litigation
- ☐ 7 Appeal to District Judge from Magistrate Judgment

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

Bankruptcy 28 USC § 1334

Brief description of cause:
Removal to Bankruptcy Court

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) PENDING OR CLOSED

(See instructions):

JUDGE

DOCKET NUMBER

DATE

4/9/08

SIGNATURE OF ATTORNEY OF RECORD

Mark A. Sanders

SBOT 17600500

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

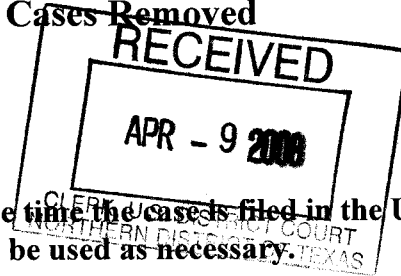
JUDGE

MAG. JUDGE

United States District Court
Northern District of Texas

308 CV - 608 - 0

Supplemental Civil Cover Sheet For Cases Removed
From State Court



This form must be attached to the Civil Cover Sheet at the time the case is filed in the U.S. District Clerk's Office. Additional sheets may be used as necessary.

1. State Court Information:

Please identify the court from which the case is being removed and specify the number assigned to the case in that court.

<u>Court</u>	<u>Case Number</u>
134 th District Court Dallas County, Texas	DC-05-12895

2. Style of the Case:

Please include all Plaintiff(s), Defendant(s), Intervenor(s), Counterclaimant(s), Crossclaimant(s) and Third Party Claimant(s) still remaining in the case and indicate their party type. Also, please list the attorney(s) of record for each party named and include their bar number, firm name, correct mailing address, and phone number (including area code.)

<u>Party and Party Type</u>	<u>Attorney(s)</u>
<u>Plaintiffs</u>	Mitchell Madden Four Hickory Centre 1755 Whittington Place, Suite 300 Dallas, Texas 75234 Telephone: 972-484-7780 Facsimile: 972-484-7743

20/20 MANAGEMENT COMPANY
ST. JOHN'S HOLDINGS, INC.
MICHAEL NEARY

Defendants

Mark A. Sanders
State Bar No. 17600500
11451 Katy Freeway, Suite 501
Houston, Texas 77079
Telephone: 713-468-7700
Facsimile: 713-468-7701

COMUNIDAD KENSINGTON CLUB I, LLC
MIKOB PROPERTIES, INC.
ALLAN KLEIN
MITCHELL KOBERNICK
COMUNIDAD BALBOA, LLC
COMUNIDAD KENSINGTON CLUB II, LLC
COMUNIDAD HARBORTREE, LLC
COMUNIDAD CAPITAL LLC
COMUNIDAD STONEHAVEN, LLC
COMUNIDAD WISTERIA GARDENS, LLC
BALBOA PARTNERS, LTD.
BP APT. MANAGEMENT, L.C.
KCP MANAGEMENT, L.C.
O. CREEK MANAGEMENT, INC.
OAKS OF BRITTANY MANAGEMENT, INC.
OAKS OF BRITTANY, LTD.
S. HAVEN MANAGEMENT, L.C.
S. HAVEN PARTNERS, LTD.
F. COURT MANAGEMENT, L.C.
F. COURT PARTNERS MANAGEMENT, L.C.
ASHFORD EST. PARTNERS, LTD.
KENSINGTON GREEN (MK), INC.
KENSINGTON GREEN (AK), INC.
KENSINGTON CLUB PARTNERS, LTD.
KENSINGTON CLUB APARTMENTS, LTD.

COMUNIDAD CORPORATION

Michael W. Eaton
EATON LAW FIRM, P.L.L.C.
1310 N. White Chapel Road, Suite 200
Southlake, Texas 76092
(817) 410-9500
(817) 410-9525 Fax

Intervenor

INTERNATIONAL REALTY CONCEPTS, INC.

Lawrence J. Friedman
Friedman & Feiger, L.L.P.
5301 Spring Valley Road, Suite 200
Dallas, Texas 75254
972-788-1400
972-788-2667 Fax

3. **Jury Demand:**

Was a Jury Demand made in State Court?

* Yes ☐ No

If "Yes," by which party and on what date?

Plaintiffs

12/21/05

Party

Date

Supplemental Civil Cover Sheet
Page 2

4. Answer:

Was an Answer made in State Court?

* Yes ☐ No

If "Yes," by which party and on what date?

MIKOB PROPERTIES, INC.
ALLAN KLEIN
MITCHELL KOBERNICK

June 6, 2006

COMUNIDAD CORP.

February 27, 2006

COMUNIDAD BALBOA, LLC
COMUNIDAD KENSINGTON CLUB II, LLC
COMUNIDAD HARBORTREE, LLC
COMUNIDAD CAPITAL LLC
COMUNIDAD STONEHAVEN, LLC
COMUNIDAD WISTERIA GARDENS, LLC

December 21, 2007

BP APT. MANAGEMENT, L.C.
KCP MANAGEMENT, L.C.
O. CREEK MANAGEMENT, INC.
OAKS OF BRITTANY MANAGEMENT, INC.
OAKS OF BRITTANY, LTD.
S. HAVEN MANAGEMENT, L.C.
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KENSINGTON GREEN (MK), INC.
KENSINGTON GREEN (AK), INC.
KENSINGTON CLUB PARTNERS, LTD.
KENSINGTON CLUB APARTMENTS, LTD.

March 3, 2008

5. **Unserved Parties:**

The following parties have not been served at the time this case was removed:

<u>Party</u>	<u>Reason(s) for No Service</u>
N/A	

6. **Nonsuited, Dismissed or Terminated Parties:**

Please indicate any changes from the style on the State Court papers and the reason for that change:

<u>Party</u>	<u>Reason</u>
N/A	

7. **Claims of the Parties:**

The filing party submits the following summary of the remaining claims of each party in this litigation:

<u>Party</u>	<u>Claim(s)</u>
Plaintiffs	suit for real estate brokerage commission and asset management fee
Intervenor	suit on a note